WT Docket No. 02-46

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Metropolitan 911 Board
2099 University Ave. W.
St. Paul, MN 55104

Metropolitan 911 Board response to the FCC request for comments on Technical and Operational Wireless E911 Issues – Hatfield Inquiry

The Metropolitan 911 Board, a joint powers association of county government representing twenty-six 911 Public Safety Answering Points (PSAPs) in the seven county Minneapolis / St. Paul, Minnesota, metropolitan area, has participated in meetings with three wireless carriers to date to discuss Phase II deployment. Additional meetings with the other four carriers are being setup at the time of this response. With the understanding that the information provided to the Board by the carriers is general and preliminary in nature, the Board is very concerned about the carrier's proposed Phase II deployment configuration that we have heard described thus far.

It is the Board's understanding that the FCC's Phase II requirements were intended to:

- Route Phase II wireless 911 calls to the PSAP serving the actual 911 caller's location.
- Present Phase II wireless 911 calls to the PSAP dispatcher in the same manner that wireline enhanced 911 calls are presented with an x,y coordinate rather than an address.
- Define who was responsible for paying for the upgrades necessary to the wireless networks, 911 service provider (LEC) 911 network and database, and the PSAP equipment / software.

With the above understanding and the information we have received from the carriers, the Board has the following concerns:

- None of the carriers we have met with to date have said they would be able to route Phase II calls to the correct PSAP, based on the 911 caller's actual location. All of the carriers said Phase II calls would

be routed to whatever PSAP was assigned to handle Phase I calls for the particular cell site / sector handling the Phase II call. One carrier said they had no intention of ever routing Phase II calls based on the caller's actual location.

- All of the carriers indicated that the PSAP dispatchers would receive only Phase I ALI data at the time the call is delivered to the PSAP. The carriers would require the dispatcher to manually initiate additional ALI database queries in order to receive a wireless Phase II 911 caller's actual location. This is dramatically different from the way all other 911 call ALI information, including Phase I, is presented to the dispatcher. With Phase I the wireless call data and call back number are dynamically pushed into the ALI database. This allows the Phase I call to be presented to the dispatcher automatically, using the PSAP 911 equipment generated ALI request, in the same way all other enhanced 911 calls are presented.

These two issues must be addressed before any wireless carrier Phase II solution is accepted and considered truly Phase II compliant. The whole point of the enhanced 911 system is to get a 911 caller routed to the correct PSAP in order to get the caller the emergency assistance needed as efficiently as possible. If carriers are allowed to route Phase II calls based on Phase I parameters, many calls will be sent to the wrong PSAP. This will create delays, confusion, and waste limited public safety resources. We accept the fact that some of the technology being deployed today does not permit selective routing at call setup. We hope that carriers will continue to work toward selective routing at call setup as the ultimate solution. This must be recognized as the only acceptable final Phase II solution, and the only outcome of 94-102 that is Phase II compliant, as we interpret the Order.

The 911 service providers, PSAP 911 equipment vendors, and PSAPs were not adequately involved in the process when the ALI database Phase II interface being proposed was developed. This repeated ALI request procedure that requires the 911 dispatcher to manually initiate these requests is unacceptable. The 911 dispatcher must be allowed to concentrate on handling the 911 caller. The dispatcher cannot do their job if they have to repeatedly focus on manipulating equipment during a call. Any non-standard call handling procedure will lead to mistakes and confusion. With up to eight potential carriers serving a given area, it appears likely there will be variations in call presentation even among the Phase II carriers. Carriers implementing handset based Phase II solutions that will present a mixture of Phase I and Phase II calls on the same carrier network will further complicate the call processing and will compromise public safety's ability to adequately and promptly respond to the call for help.

Wireless Phase II calls must be presented to the dispatcher in exactly the same way as Phase I and wireline 911 calls are presented. This will require carriers to push Phase II data into the ALI database as is required today on Phase I and wireline calls. It may also require the ALI database and PSAP 911 equipment vendors to develop a method of automatically updating the dispatcher's ALI display as Phase II information becomes available or changes on a dynamic basis.

The Board would encourage the FCC to continue to permit carriers to deploy the technology that is available today. However, the Board believes it is imperative that the carriers be required to continue to improve their enhanced 911 systems until wireless 911 calls can be correctly routed at call setup and are presented to the 911 dispatcher with the same procedure and format as all other 911 calls are received. Any thing less should not be considered as meeting the Phase II requirements.

Respectfully Submitted,

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